

**TAB 2 Excerpt of Comments from the SDA/CTFA Industry
Coalition Regarding the Benefit and Efficacy of Consumer
Antiseptic Handwashes (75N-183H; C12, volume 1)**

General Population Products

Antimicrobial Handwash and Antimicrobial Bodywash

It is well-recognized (Larson, 1988; Larson, 1994; Maki, 1978) in hospital settings that antimicrobial cleansing products have a role in infection control. Antimicrobial washes are also used by the general consumer for personal hygiene.

The routine use of personal antimicrobial wash products is beneficial to all. The potential benefits to consumers of antimicrobial washes in addition to cleaning are: (1) to help reduce the incidence of pyogenic infections (Marzulli and Bruch, 1981; Taplin, 1981); (2) to help remove transient organisms which are potentially pathogenic (Noble, 1993); and, (3) to reduce odor-causing bacteria (Marzulli and Bruch, 1981). Washing with antimicrobial washes or with non-medicated washes will remove some bacteria from the skin due to the surfactancy of the base and the mechanical action of the washing procedure. However, antimicrobial washes deposit an active ingredient on the skin that can control the number of organisms that survive and help prevent the colonization of potential pathogens such as *Staphylococcus aureus*, and/or provide increased antimicrobial activity compared to a non-antimicrobial wash product (Marzulli and Bruch, 1981). Washing with non-medicated washes does not provide this reservoir of antimicrobial activity.

Since one out of every three consumer purchases of personal cleansing products is an antimicrobial wash product, it is evident that consumers view antimicrobial washes as an important product class. They view antimicrobial cleansers as good for the entire family, and believe antimicrobial cleansers provide a cleaner feeling and more germ removal than non-medicated products. This high level of acceptance and consumer need is reflected in the marketplace where approximately half (47%) of the households in the United States use antimicrobial wash products. Consumer acceptance is also reinforced by recommendations from physicians. For example, 60% of the pediatricians surveyed have recommend the use of an antimicrobial soap to their patients for a variety of needs. At the 1995 Annual Meeting of the American Academy of Dermatology (AAD), 93.1% of dermatologists surveyed said they recommended antimicrobial soaps. Additionally 82.3% responded that their ability to help manage their patient's medical conditions would be adversely impacted if OTC antimicrobial cleansing products were not available (Dial, 1995a).

Antimicrobial washes are available in many forms (bars, liquids, gels, etc.) and contain a single antimicrobial ingredient. The application of antimicrobial washes is primarily for two different purposes. Products applied to the hands during handwashing reduce organisms on the hands and can reduce the possibility of disease transmission. Antimicrobial bodywashes can play a role in the prevention of pyogenic infections and

help control odor-causing bacteria. Whole body use of antimicrobial products can control the number of organisms on the skin and has been demonstrated under laboratory studies to reduce the number of potential pathogens on the skin (Aly and Maibach, 1981). These two purposes call for different modes of action and different spectra of activity. In everyday life consumers encounter situations where they are exposed to a variety of bacteria that have the potential to cause infection. It is well recognized that good personal hygiene can reduce the risk of infection. Antimicrobial washes can play an important role in improving personal hygiene.

The skin is a dynamic environment inhabited by living organisms. It cannot be studied as a whole, but must be subdivided into different micro-habitats. In general the surface can be divided into drier and moister areas depending on the region of the body, the hairy covering, glandular supply, and the type and extent of clothing worn. Additionally, the relative importance of factors that influence the development of skin disease such as etiologic agents, host factors, geo-climatic factors, and occupation are often not apparent, and may be difficult to assess (Jones et al., 1976). For example, different regions of the body vary in their exposure to the air and, therefore, to the evaporative process. Clothing, in general, reduces air movement and maintains a high relative humidity and a constant air temperature immediately adjacent to the skin. In comparison, the hands of most individuals remain uncovered except for short periods of time, show little reaction to changes in body heat, are washed more frequently than any other area of the body, and come in contact with the environment to the greatest degree (Marples, 1965). Therefore, they are the most susceptible to trauma and contamination by pathogenic organisms. All these factors indicate that the hands provide a very special habitat which differs in many ways from the general skin surface. Antimicrobial wash products intended primarily for handwashing must be formulated with this difference in mind, and are discussed below.

Just as the skin can be divided into specific habitats based on many factors, so too should antimicrobial wash products used on the skin be separated according to appropriate usage, efficacy, and attributes.

Efficacy Data

The Agency has requested data to support the efficacy of antimicrobial products for use by consumers and foodhandlers (FDA, 1994). The proprietary nature of this data makes it difficult to prepare a joint submission that would become public record. The industry is in the process of evaluating this highly confidential data with the intent of meeting the December 15, 1995 deadline for submission of data.

Antimicrobial Handwashes

There is consensus in the medical and scientific communities that transfer of transient bacteria via hands is a major factor in the spread of disease (Larson, 1988). Hands can be viewed as unique in three respects. First, hands, more than any other part of the body, are in constant contact with the environment and as such reflect exposure to transient contaminants from many sources. Second, various parts of the hand such as the nail folds and interdigital spaces provide specific microenvironments which can support organisms with varying growth requirements. Third, the flora of the skin of the hands is highly subject to modification because of the exposure to a number of varied household activities.

The importance of the role of handwashing for infection control has been thoroughly reviewed for settings outside the home (Larson, 1988; Bryan et al., 1995). Although there are no definitive studies in the literature within home settings on currently marketed products, there are numerous studies suggesting a role for antimicrobial washes in personal hygiene. Regarding the absence of clearly definitive trials, Larson (Larson and Rotter, 1990) has written, "I'm not convinced that even the definitive study for which we have been lobbying and waiting would, in fact, influence practice. What we know now from natural experiments, epidemiological studies and experimental models is that clean hands are associated with reduced risk of contact-spread infection in a variety of settings...." It can be argued, based on the spread of disease amongst family members, that the added benefit of residual activity and of increased awareness of the need for handwashing reflected in the purchase of antimicrobial consumer products has a role for their use in the home.

Everyone picks up germs from contact with the environment, and antimicrobial soaps help to remove these germs. Broad spectrum activity is preferable because of the wide variety of potential sources of infection. However, immediate kill is not necessarily affected because consumer soaps remove much of the organism load through the surfactancy mechanism but do not provide long-lasting residual activity. In effect, the surfactancy mechanism is broad spectrum and, in conjunction with vigorous washing, is fairly effective (Ayliffe, 1980; Ehrenkranz, 1992). However, consumer handwashing is incomplete, rarely is it as thorough as in the hospital setting, and so a residual action is desirable. Bartzokas et al. (1987) reported that the efficacy of an antimicrobial handwash preparation "was significantly augmented" with repeated handwashing.

The flora on the hands and influencing factors have been studied. The transient bacteria lie free on the skin or are loosely attached with dirt (Rayan and Flourney, 1987). The resident flora is a stable population in both size and composition. Washing readily removes most transients, but the resident flora is removed more slowly. Aly and Maibach

(1988) showed that subjects can have as many as 10^6 colony forming units recoverable from their hands. McGinley et al. (1988) point out that many types of flora are found in the subungual region of the hands and can be detected after handwashing. Peterson (1985) presented data on the normal flora of the hands and the factors that affect the numbers of flora including different household activities like gardening and food preparation. Obviously, the flora that may be present on the hands as transients are greatly influenced by the activity related to a source of contamination and the environmental conditions. For the consumer, these include, among others, food preparation, contact with pets, gardening, and yardwork, contact with other people, daycare, school, work, travel, and recreation. These are examined further below.

Surveys of the bacteria found in the home environment (Scott et al., 1982; Finch et al., 1978; Mendes and Lynch, 1976; Bloomfield, 1978; Roach, 1994) suggested four major sites of household contamination: dry areas (e.g., floors, linens, furniture, clothing), wet areas (e.g., baths, sinks, toilets, drains), food, and people. In many homes, animals (e.g., pets, farm animals) and outside work (gardening, yard work) should be included. Scott et al. (1982) pointed out that although it is accepted that the risk of infection in the general community is lower than that associated with hospitalized patients, increases in the number of outbreaks of household food poisoning cases had been observed. In the survey by Scott et al. (1982), high bacteria counts were found mainly in wet areas associated with sinks, baths, and diaper pails. High bacteria counts also were frequently recovered from washcloths, dishcloths, and cleaning towels. The survey included isolation for *Escherichia coli*, pseudomonads, *S. aureus*, and streptococci. Marples and Towers (1979) further established a model to study how contact transfer of *Staphylococcus* can occur from objects. Borneff et al. (1985) examined households for organisms causing infectious enteritis and found 267 of 4683 samples contained staphylococci. These studies support the need for handwashing and the desirability of antimicrobial soaps.

The shift in recent years from home-based child care to group daycare further extends the household environment because of the likelihood of transmission back to the family and further intrafamilial spread (Goodman et al., 1984; Pickering et al., 1986; Morrow et al., 1991; Chorba et al., 1987; Fornasini et al., 1992). Surveys of the daycare center environment have found contamination of the surfaces, toys, food areas, diaper changing areas, and the hands of children and adults (Ekanem et al., 1983; Van et al., 1991; Osterholm et al., 1992; Holaday et al., 1990; Laborde et al., 1993). With 5.3 to 11 million children in out-of-home daycare in the United States, an important number of families are exposed to conditions where hygiene may be less than satisfactory (Bartlett et al., 1988). Laborde et al. (1993) were able to demonstrate an increased risk of diarrhea associated with fecal contamination levels. They found that toys had the highest coliform bacteria contamination level and that hand contamination strongly affected diarrhea incidence. They state that "hands can be primary vehicles of enteric disease transmission." Dry surfaces, while contaminated, appeared less likely to be significant

sources of enteropathogens. Compounding the problem are inadequate personal hygiene practices. One study estimated that staff compliance with handwashing recommendations was only found in 75% of the centers studied (Adiss et al., 1994). The recent work of Laborde et al. (1993) demonstrated a correlation between the contamination level and the increased risk of disease, and reemphasized the obvious need for improved handwashing. Thompson (1994) emphasized the need for frequent handwashing to improve daycare hygiene, "... studies together emphasize the importance of constant reinforcement of the importance of handwashing, but also the need to train people in how to wash their hands to minimize microbial contamination."

Morrow et al. (1991) and Osterholm et al. (1992) demonstrated the transmission of disease from daycare centers to the home where it is transferred among family members. For example, *Clostridium difficile* is a cause of antibiotic-associated colitis. It has been shown to occur in daycare centers and to be transferred to families. Persons providing at-home care for ill children or the elderly adult have an additional personal hygiene need where antibacterial washes may be useful (Ahmed et al., 1993; Smith, 1984). Using selective media, it was found that contamination with this organism was common in the environment of patients with the disease. It was often found on floors, toilets, bedding, mops, scales, and furniture. The organism was also present less often in areas in which patients known to carry this hardy spore-forming organism had not been present. Air, food, and walls were negative. The organism was isolated from the hands and stools of asymptomatic hospital personnel. It was also found on surfaces in a patient's home. The importance of the various sources of the organism in its spread is not known. It was suggested that enteric isolation precautions, and careful handwashing and cleansing of potentially contaminated surfaces and objects may be worthwhile when cases of antibiotic-associated colitis are identified (Fekety et al., 1981).

Roth and Land (1987) instruct family members to wash hands immediately after touching contaminated objects and surfaces such as soiled laundry to help keep home care from becoming a health hazard to other family members.

Handwashing while at work is most often found with the foodhandling and preparation industry where the consequences of poor personal hygiene can produce outbreaks of disease (Foulke, 1994). Products appropriate for this use have been discussed in a previous section. However, in addition to the obvious exposures inherent in foodhandling and activities like diaper changing in daycare centers, there are a number of other activities encountered at work which lead to exposures to potentially harmful microorganisms. These include handshaking, exposure to ill colleagues in meetings, contact with the public, sharing objects such as public toilets, telephones, exercise equipment and money, as well as other obvious situations such as those encountered by animal handlers or sanitation workers (Noble, 1983). Good personal hygiene is obviously important at work. The Mayo Clinic (1993) points out that it is critical to wash

hands after using the bathroom, handling food, handling money, coughing, sneezing, etc. Additionally, Good Manufacturing Practices require handwashing under several circumstances such as before returning to the laboratory or manufacturing floor after using the bathroom.

Bryan et al. (1995) recently updated a previous literature review (Larson, 1988) on the importance of handwashing in reducing the spread of infection. Thirteen non-experimental studies and five experimental studies were identified in the review from settings from the operating room to daycare centers, to an outdoor festival to villages and urban areas of developing countries. These studies and additional work demonstrating the effectiveness of handwashing are summarized below.

Studies in Developing Countries and Non-Institutional Settings

There are several studies from developing countries. These were conducted in an environment conducive to the spread of disease. These data are relevant to conditions found in areas of the United States where hygiene is poor, such as border shanty towns and Indian reservations (Mintz et al., 1995). They are also relevant to other situations, such as daycare (Pickering et al., 1986) and outdoor music festivals (Lee et al., 1991).

Neonatal tetanus remains one of the major causes of death in developing countries. Results of a study on risk factors of neonatal tetanus in Senegal by Leroy and Garenne (1991) suggest that teaching mothers and birth attendants simple hygienic principles and basic techniques may have a significant impact on neonatal tetanus mortality. The skill and behavior of the birth attendant and mother were highly significant risk factors and were associated with high odds ratio and included whether the hands of the person cutting the umbilical cord were washed with soap. Similarly, a study in rural Bangladesh (Hlady et al., 1992) found a significantly lower risk of neonatal tetanus when the person cutting the umbilical cord had washed their hands.

Diarrhea is a major cause of illness globally. Clemens and Stanton (1987) showed in an urban Bangladesh study that significantly more diarrhea occurred in children whose mothers did not wash their hands before food preparation. In a randomized trial in urban Bangladesh to study the effects of an educational intervention program on hygiene and diarrhea rates, Stanton and Clemens (1987) reported that the incidence of diarrhea in the intervention group was 26% lower than in the control group. After intervention, 49% of the test families versus 33% of the control families washed their hands before food preparation. This improvement in personal hygiene was related to the improvement in diarrhea incidence.

Kaltenhalter et al. (1991) conducted a study in Zimbabwe that demonstrated that washing with soap is more effective in reducing fecal bacteria contamination of hands than not

using soap. Their data also suggest that an antimicrobial soap would be beneficial beyond plain soap by providing residual activity versus organisms which are found on hands after washing, especially in hot humid conditions.

Kahn (1982) concluded that handwashing had a positive effect on interrupting shigellosis transmission even in unsanitary environments in rural Bangladesh.

Wilson and Chandler (1993) determined from their education program which encouraged handwashing with soap among fifty-seven mothers in Indonesia, that two years after the intervention (1) 79% of mothers were still using hand soap, despite the fact that they now had to buy it themselves, and (2) the community seemed to be benefiting from a sustained reduction in diarrhea episodes due to improved hygiene practices.

In a study conducted in Indonesia (Wilson et al., 1991), children experienced an 89% reduction in diarrhea episodes versus the control period, when their mothers were given soap for handwashing and an explanation of the fecal-oral route of diarrhea transmission.

Verweij et al. (1991) suggest that improving water supply alone did not correlate with an improvement in infectious disease, but the prevalence of infectious skin disease was negatively correlated with the frequency of washing. It was concluded that personal hygiene appears to play an essential role in keeping the prevalence of infectious disease low.

As pointed out by Bryan et al. (1995) inadequate sanitation and poor hygiene are conditions that are not limited to developing countries. In the outbreak described by Lee et al. (1991) an estimated 3,175 women attending a 5-day outdoor music festival contracted shigella gastroenteritis. Limited access to soap and running water by the more than 2,000 volunteer food preparers was suggested as a contributing factor.

Institutions and Schools

Black et al. (1981) first demonstrated the effectiveness of handwashing to prevent diarrhea in daycare centers. Following the initiation of a handwashing program in several daycare centers, the incidence of diarrhea among children in the study was significantly and consistently lower (approximately half) than the incidence in the two control centers over the 35-week study period.

Bartlett et al. (1988) studied diarrheal illness among day care children. Ten randomly selected intervention centers received staff training in procedures to reduce diarrhea transmission and follow up surveillance. Eleven other centers were also followed. The twenty-one centers had higher rates of diarrheal disease than children in home care, but significantly lower rates than centers not in the surveillance. In addition, they suggest

that further attention must be directed to effective promotion of hygienic practices among daycare center workers without external monitoring. Finally, an additional study was recommended to identify specific practices, other than handwashing, that could reduce the introduction and transmission of infectious agents in child care groups.

It is recognized that it is often difficult to attribute independent specific effectiveness to an intervention and control program because they are inherently multifaceted. For example Butz et al. (1990) evaluated the effectiveness of an intervention program in daycare homes that included handwashing education, the use of vinyl gloves, disposable diaper changing pads, and an alcohol based hand rinse. Symptoms of enteric illness were lower in the intervention homes, but it was not possible to separate out the effects of each component of the intervention.

Nokes (1983), in an article on nosocomial infections and handwashing, indicates the most effective method of decreasing the spread of infection is effective handwashing.

Nahata (1985), in reviewing disease transmission in daycare centers, wrote, "it has been clearly shown that handwashing can prevent diarrhea and respiratory disease."

Harris et al. (1985), in their study of person to person transmission in an outbreak of enteroinvasive *Escherichia coli* at a school for mentally retarded adults and children in Missouri, stated that control measures to interrupt the transmission of *E. coli* included separation of symptomatic or culture positive students from those who were emphasizing handwashing and were healthy.

Peters and Flick-Filles (1991) reported that use of a hand disinfectant by new mothers helped to significantly reduce the incidence of puerperal mastitis from 2.9% in the control group to 0.65% in the intervention group.

Wilson (1970) showed significant reductions of skin flora with a TCC soap. "In an 18 month ward trial the transmission of staphylococci was significantly reduced by the TCC soap."

Lilly et al. (1979) suggest that repeated washing can result in an equilibrium level of flora where the reduction in density of accessible bacteria is balanced by their replacement by bacteria from the deeper layers of skin. This is important in that Selwyn and Ellis (1972) argue the "care for minimal disinfection" citing the need to maintain resident skin organisms as barriers to infection.

In addition to experimental and field trials, a number of controlled studies have been used to demonstrate antimicrobial effectiveness (Cade, 1951; Finkey et al., 1984; Leyden et

al., 1979; Leyden et al., 1981; Price, 1938; Williamson and Kligman, 1965; Yackovich and Heinze, 1985; Yackovich et al., 1986; Yackovich et al., 1989).

The above discussion has clearly pointed out that improved hygiene can help prevent skin infections and interrupt the transmission of infectious disease as transferred by the hands. Therefore, the regular use of an antimicrobial soap for personal cleansing has a recognized role in the prevention of disease. Handwashing is repeatedly cited as the most important infection control measure. It is no less important in the home than in these village and institutional studies cited above.

It can be demonstrated that antimicrobial washes reduce the numbers of organisms on the skin to a greater extent than non-medicated wash. In addition, model systems (Aly, 1994; Scala et al., 1994) have demonstrated the control of potentially pathogenic organisms on the skin. For handwashing to be effective it is important that any product also be acceptable for regular and frequent use by consumers. "As the value of frequent handwashing is well established, the choice of soap brand should be made with a view to encouraging frequent handwashing, while maintaining healthy skin" (Reis-Levy et al., 1984). Antimicrobial ingredients, deposited on the skin, can also be of benefit when washing is perfunctory or inadequate, leaving behind organisms that can cause infection or be transferred to other skin sites. Appropriate degerming for consumers also does not present the risk of removing resident flora to the point of creating a flora shift. Aly and Maibach (1976) showed that prolonged use of antimicrobial soap on skin did not lead to overgrowth of undesirable flora.

Methods

Based on an understanding of the risks involved, the organisms of greatest significance, the population affected, and the products and frequency of use in this category, it is recommended that the following testing procedures and efficacy guidelines be used for antimicrobial handwashes. Both *in vitro* and *in vivo* methods are proposed (Table V).

In vitro testing to establish the spectrum of action of the active ingredient includes Gram positive and Gram negative organisms representative of flora that may be found on the hand as well as one yeast (Table V). The MIC Test (Appendix I) is proposed for testing of active ingredients and finished products only. The test serves to delineate the spectrum of activity of an ingredient or formula, and can be useful for determining active ingredient formulation levels, and active ingredient/vehicle interactions. MIC testing of active ingredients is performed on the organisms listed in Table A. For ingredients to be used in handwash products it is not expected, nor required, that they demonstrate activity against all listed organisms. The MIC testing of handwash products is done against those organisms which are most significant to this category as shown in Table V. Time-Kill tests (Appendix II) are performed by testing the product against the significant organisms

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